

REMARKS**I. Administrative Overview**

Claims 1-9, 11-14, 19-32, 34, 40 and 44-46 were presented. Claims 1, 19 and 25 have been amended. Applicants submit that no new matter has been added. Upon entry of the presented amendments, Claims 1-9, 11-14, 19-32, 34, 40 and 44-46 are pending, of which Claims 1, 19 and 25 are independent claims.

Applicants traverse each of the rejections and respectfully request reconsideration of the amended claims, and withdrawal of all rejections levied against the pending claims.

II. Rejections under 35 U.S.C. § 101

Claims 19-24 and 44-45 are rejected under 35 U.S.C. § 101 for failing to claim patentable subject matter. Applicants traverse this rejection and respectfully submit that Claims 19-24 and 44-45 claim statutory subject matter.

Under 35 U.S.C. § 101, statutory subject matter is defined as "any new and useful process, machine, manufacture, or composition of matter." Subject matter that does not fall within one of these categories or that otherwise preempts use by others of the excepted subject matter is still "surely patent-eligible under § 101 if: (1) it is tied to a particular machine or apparatus." See *In Re Bilski*, No. 2007-1130, Serial No. 08/833,892 at 10 (Fed. Cir. Oct. 30, 2008); see e.g. MPEP § 2106(IV)(D).

Claim 19 claims statutory subject matter because it recites a system that is tied to a particular machine, i.e. a client system including an event manager and a server system executing a control virtual driver and a redirector virtual driver. The functions carried out by the event manager, the control virtual driver and the redirector virtual driver are a result of the execution of these components on either the client system or the server system. Therefore, although Claim 19 properly claims a machine, the machine claimed by Claim 19 is also tied to a client system and a server system. Any contentions that Claim 19 claims software per se, or otherwise unpatentable subject matter, are improper because Claim 19 properly claims subject matter that falls within the enumerated statutory categories and subject matter that is tied to a particular machine.

Claims 20-24 and 44-45 depend on and incorporate all of the patentable subject matter of independent Claim 19. Therefore, Applicants submit that Claims 20-24 and 44-45 also claim

statutory subject matter. Accordingly, Applicants respectfully request withdrawal of this rejection.

III. Rejections under 35 U.S.C. 103

Claims 1-4, 11-13, 19-20, 25, 27-28 and 44-46

Claims 1-4, 11-13, 19-20, 25, 27-28 and 44-46 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Publication Number 2004/0128412 to Harrison ("Harrison") in view of U.S. Patent Number 7,464,133 to Kasasaku et al. ("Kasasaku.") Applicants respectfully submit that Claims 1-4, 11-13, 19-20, 25, 27-28 and 44-46 are patentable over any combination of Harrison and Kasasaku. Nevertheless, Claims 1, 19 and 25 have been amended to more clearly recite the claimed invention. Applicants respectfully submit that amended Claims 1-4, 11-13, 19-20, 25, 27-28 and 44-46 are patentable over any combination of Harrison and Kasasaku.

Prima facie obviousness requires that cited references, alone or together, teach or suggest each and every element of the claimed invention. Applicants respectfully submit that both Harrison and Kasasaku fail to teach or suggest: (1) mapping a device into a user session responsive to receiving an event notification that a device is in communication with a client system; and (2) binding an event notification to a port number associated with a virtual communication channel to generate binding information associated with the device.

Applicants agree with the Examiner that Harrison cannot teach "binding, by a redirector virtual driver executing on the server, the event notification to a port number associated with a virtual communication channel to generate binding information associated with the device." *See* Office Action mailed June 22, 2009, page 4. However, Applicants also submit that Harrison does not teach or suggest mapping a device into a user session responsive to receiving an event notification that a device is in communication with a client system as is required by each of the independent claims.

Harrison describes a system for synchronizing a calendar on a PDA with a calendar on a PC using an adaptor box. *See* Harrison, paras. 77-81. The adaptor box establishes a connection between a peripheral device (i.e. a PDA) and a PC, and uses a translation module to convert the standard interface used by the peripheral device/PDA to a network stream and vice versa. *See* Harrison, paras. 48-49. When calendar data is transmitted to and from the PDA to the PC, the

calendar data is merely translated from a serial interface format, to a TCP/IP transport format, and back to a serial interface format. At no point does Harrison teach or even suggest that the PDA should be mapped into a session on the PC. Harrison only describes translating data from one format to another in order to transmit the data to and from the PDA to the PC.

Harrison also does not teach mapping responsive to an event notification because Harrison does not teach or even suggest an event notification. Harrison merely describes translating a read/write request from one format to another, where the system issues the request in response to a request to either read or write data from or to a peripheral device. Thus, the read/write request is not an event notification that a device is in communication with a client system.

As Harrison does not teach or suggest binding, neither does Kasasaku teach or suggest binding an event notification to a port number. Kasasaku describes setting the I/O port numbers and the address of the client, the peripheral device and any other components having an address. Assigning an address or configuring an I/O port number is not the same as binding an event notification to a port number, where the event notification comprises at least a device name, a product identifier and a universal identifier, because the port numbers and addresses described in Kasasaku are not based on and do not otherwise comprise a device name, a product identifier and a universal identifier. At no point does Kasasaku teach or even suggest binding a device name, a product identifier and a universal identifier to a port number. Thus, Kasasaku does not teach or suggest binding an event notification to a port number.

Also like Harrison, Kasasaku does not teach or suggest mapping a device into a user session responsive to receiving an event notification. As described above, Kasasaku does not teach or suggest an event notification comprising at least a device name, a product identifier and a universal identifier. While Kasasaku may describe mapping a physical I/O port to a virtual port, Kasasaku does not teach mapping a device into a user session. Thus, Kasasaku does not teach or suggest mapping responsive to an event notification, or mapping a device into a user session.

Both Harrison and Kasasaku fail to teach or suggest binding an event notification to a port number associated with a virtual communication channel to generate binding information associated with a device, therefore Claims 1, 19 and 25 are patentable over any combination of Harrison and Kasasaku. Claims 11-13, 14, 20, 34, 40 and 44-46 depend on Claims 1, 19 and 25,

therefore Claims 11-13, 14, 20, 34, 40 and 44-46 are also patentable over Harrison in view of Kasasaku. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

Claims 5 and 26

Claims 5 and 26 are rejected under 35 U.S.C. § 103(a) as unpatentable over Harrison in view of Kasasaku and in further view of U.S. Patent No. 7,024,501 B 1 to Wright ("Wright"). Applicants respectfully submit that Claims 5 and 26 as previously presented are patentable over any combination of Harrison, Kasasaku and Wright.

Establishing prima facie obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants respectfully submit that independent Claims 1, 19 and 25 are patentable and in a condition for allowance. Therefore Claims 5 and 26 are also patentable and in a condition for allowance because Claims 5 and 26 depend on and incorporate all the patentable subject matter of Claims 1, 19 and 25. Furthermore, the Examiner cites Wright merely to address mapping a device communicating with the client system via a Wi-Fi connection. Like Harrison and Kasasaku, Wright also fails to teach or suggest (1) mapping a device into a user session responsive to receiving an event notification that a device is in communication with a client system, and (2) binding an event notification to a port number associated with a virtual communication channel to generate binding information associated with the device. Thus, Wright fails to detract from the patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

Claims 6, 9, 21, 22, 29 and 32

Claims 6, 9, 21, 22, 29 and 32 are rejected under 35 U.S.C. § 103(a) as unpatentable over Harrison in view of Kasasaku and in further view of U.S. Patent No. 7,325,026 B 1 to North ("North"). Applicants respectfully submit that Claims 6, 9, 21, 22, 29 and 32 are patentable over any combination of Harrison, Kasasaku and North.

Establishing prima facie obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants

respectfully submit that independent Claims 1, 19 and 25 are patentable and in a condition for allowance. Therefore Claims 6, 9, 21, 22, 29 and 32 are also patentable and in a condition for allowance because Claims 6, 9, 21, 22, 29 and 32 depend on and incorporate all the patentable subject matter of Claims 1, 19 and 25. Furthermore, the Examiner cites North merely to address using socket communication for inter-process communications, and hooking a socket call within the user session. Like Harrison and Kasasaku, North also fails to teach or suggest (1) mapping a device into a user session responsive to receiving an event notification that a device is in communication with a client system, and (2) binding an event notification to a port number associated with a virtual communication channel to generate binding information associated with the device e. Thus, North fails to detract from the patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

Claims 7-8, 23-24 and 30-31

Claims 7-8, 23-24 and 30-31 are rejected under 35 U.S.C. § 103(a) as unpatentable over Harrison in view of Kasasaku in view of North and in further view of U.S. Patent No. 7,051,108 B 1 to Jones ("Jones"). Applicants respectfully submit that Claims 7-8, 23-24 and 30-31 are patentable over any combination of Harrison, Kasasaku, North and Jones.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants respectfully submit that independent Claims 1, 19 and 25 are patentable and in a condition for allowance. Therefore Claims 7-8, 23-24 and 30-31 are also patentable and in a condition for allowance because Claims 7-8, 23-24 and 30-31 depend on and incorporate all the patentable subject matter of Claims 1, 19 and 25. Furthermore, the Examiner cites Jones merely to address wherein the hooking is a virtual loop-back address hooking. Like Harrison, Kasasaku and North, Jones also fails to teach or suggest (1) mapping a device into a user session responsive to receiving an event notification that a device is in communication with a client system, and (2) binding an event notification to a port number associated with a virtual communication channel to generate binding information associated with the device. Thus, Jones fails to detract from the

patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

Claims 14, 34 and 40

Claims 14, 34 and 40 are rejected under 35 U.S.C. § 103(a) as unpatentable over Harrison in view of Kasasaku and in further view of U.S. Patent No. 6,895,588 to Ruberg ("Ruberg.") Applicants respectfully submit that Claims 14, 34 and 40 are patentable over any combination of Harrison, Kasasaku and Ruberg.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants respectfully submit that independent Claims 1, 19 and 25 are patentable and in a condition for allowance. Therefore Claims 14, 34 and 40 are also patentable and in a condition for allowance because Claims 14, 34 and 40 depend on and incorporate all the patentable subject matter of Claims 1, 19 and 25. Furthermore, the Examiner cites Ruberg merely to address determining the identity of the device. Like Harrison and Kasasaku, Ruberg also fails to teach or suggest (1) mapping a device into a user session responsive to receiving an event notification that a device is in communication with a client system, and (2) binding an event notification to a port number associated with a virtual communication channel to generate binding information associated with the device. Thus, Ruberg fails to detract from the patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw the rejection with respect to these claims.

IV. Conclusion

Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,
CHOATE, HALL & STEWART LLP

Date: January 11, 2010

/Cynthia M. Gilbert/
Cynthia M. Gilbert
Registration No. 65,609

Patent Group
CHOATE, HALL & STEWART LLP
Two International Place
Boston, MA 02110
Phone: (617) 248-4807
Fax: (617) 502-5002